

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION
CIVIL ACTION NO: _____

CANDICE MICHELLE HARDWICK
by and through her Parents and Guardians
DARYL LEWIS HARDWICK and
PRISCILLA LEA HARDWICK;

Plaintiffs,

vs.

MARTHA HEYWARD in her individual capacity
and in her official capacity as Principal of Latta
Middle School;

GEORGE H. LIEBENROOD, JR., in his
individual capacity and in his official capacity as
Principal of Latta High School, and the

BOARD OF TRUSTEES OF LATTA SCHOOL
DISTRICT (Dillon County No.3,

Defendants.

**PLAINTIFF'S ANSWERS TO LOCAL
CIVIL RULE 26.01
INTERROGATORIES**

Pursuant to Local Civil Rule 26.01 the following interrogatories are submitted:

(A) State the full name, address, and telephone number of all persons or legal entities
who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: NONE

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: All claims should be tried by a jury as these are constitutional claims based on
the factual issue of whether or not Confederate symbols caused a material or substantial

disruption to the educational process.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: The Plaintiffs are individuals

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

ANSWER: The events made the basis of this lawsuit all took place in Latta, South Carolina in the Florence Division of the United States District Court for the District of South Carolina. All plaintiffs and defendants reside in Latta South Carolina in the Florence Division of the United States District Court for the District of South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the

cases: arise from the same or identical transactions, happenings, or events, involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: There are no related cases that Plaintiffs are aware of.

March 30, 2006

Respectfully submitted,

LAW OFFICES OF LOURIE A. SALLEY, III

By: /s/ Lourie A. Salley, III

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